

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

JOHN DOES 1 THROUGH 7,

Plaintiffs,

- against -

THE TALIBAN *et al.*,

Defendant.

No. 20 Misc. 740 (KPF) (SN)

IN RE: TERRORIST ATTACKS ON
SEPTEMBER 11, 2001

No. 03 MD 1570 (GBDN) (SN)

FIONA HAVLISH *et al.*,

Plaintiffs,

- against -

SHEIKH USAMAH BIN-MUHAMMED
BIN-LADEN, a.k.a. OSAMA BIN-LADEN
et al.,

Defendants.

No. 03 Civ. 9848 (GBD) (SN)

**MOTION FOR LEAVE TO WITHDRAW AS COUNSEL FOR NON-PARTY
PEACEFUL TOMORROWS**

Pursuant to Rule 1.4 of the Southern District of New York, counsel of record, Jacob M. Kaplan (hereinafter “Counsel”) respectfully requests this Court allow him to withdraw from the representation of non-party, Peaceful Tomorrows. In support of this motion, Counsel states the following:

1. On April 27, 2022, this Court denied Peaceful Tomorrows’ motion for leave to file a brief as *amicus curiae*.
2. As a non-party, Peaceful Tomorrows is no longer in need of Counsel’s

representation in this matter.

3. Counsel is not asserting a retaining or charging lien.

For the foregoing reasons, Counsel respectfully requests the Court to grant this motion to withdraw as counsel for non-party Peaceful Tomorrows.

Respectfully submitted,

/s/Jacob M. Kaplan

Jacob M. Kaplan

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Dated: May 10, 2022

Attorney for Peaceful Tomorrows

CERTIFICATE OF SERVICE

I certify that on the 10th day of May, 2022 a copy of the foregoing Motion for Leave to Withdraw as Counsel was served upon Colleen Kelly, as a representative of Peaceful Tomorrows via email at colleenkelly2014@gmail.com.

I certify that on the 10th day of May, 2022 a copy of the foregoing Motion for Leave to Withdraw as Counsel was filed with the Clerk of the Court using the CM/ECF system which sent notification of such filing to all counsel of record who are registered with the CM/ECF in the above captioned matters.

/s/Jacob M. Kaplan

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